Oblon, Spivak, et al. New DIV Application

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Oblon Docket No: 243963US2RDDIV

Inv: Yoshiaki TAKABATAKE

**Preliminary Amendment** 

Remarks/Arguments:

Favorable consideration of this application, in light of the present amendments and

following discussion, is respectfully requested.

Claims 1-9, 31, and 34 are pending; Claims 1, 31, and 34 are amended; and Claims

10-30, 32, 33, 35, and 36 are canceled. It is respectfully submitted that no new matter is

added by this amendment.

Recently, request and response based networks, such as the IEEE 1394 bus, have been

combined with non-request and response based networks, such as the IEEE 802.11. When

these two types of networks combine, it is difficult to manage correspondence between

transfer data on nodes in each network. For example, because the IEEE 802.11 network has

no function for maintaining a correspondence between request and response as its MAC layer

function, it has been difficult to construct a network merging the IEEE 1394 bus and the

IEEE 802.11 network. In light of these difficulties, the Applicant developed the present

invention.

To this end, amended Claims 1, 31, and 34 recite that the packet correspondence

memory stores a correspondence between the first packet and the second packet, where the

first packet is a packet to be received from the first network side, while the second packet is a

packet to be transmitted to the second network side, which is obtained by the packet

conversion processing on the first packet. This packet conversion is useful, because the first

packet should be in a form suitable for the first network, which uses data transfer based on

combinations of request and response. The second packet should be in a form suitable for the

second network, which uses data transfer that is not based on a combination of requests and

responses.

<sup>1</sup> Specification, page 5, lines 10-31.

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When a response packet is received from the second network side in response to the second packet, a destination node on the first network side to which this response packet should be transferred must be determined. However, this response packet is in a form suitable for the second network, which uses data transfer not based on a combination of request and response, so it is not possible to determine a request packet to which this response packet corresponds by looking at the response packet itself. For this reason, the correspondence stored in the claimed packet correspondence memory is used to determine the first packet that corresponds to the second packet in response to which the response packet is received. When the first packet is identified, it is possible to determine a node from which the first packet was originally received, and the response packet may be then transferred to this node so that the destination node on the first network can be determined.

Saito (U.S. Pat. No. 6,523,696) does not store any correspondence between two packets, one of which is obtained by the packet conversion on the other. In fact, the AV control terminal of Saito is described as collecting information regarding AV devices which are connected with the network to which the other AV control terminal belongs. This information includes, for example, what AV devices they are, what contents they include, how many media they have, and what 1294 addresses they have.<sup>2</sup> However, none of this information indicates any correspondence between any two packets.

Moreover, <u>Saito</u> fails to disclose or suggest any type of determination of the destination node on a first network for the response packet received in response to the second packet from the second network side, by using a packet correspondence memory. In fact, the

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<sup>&</sup>lt;sup>2</sup> Saito, col. 15, lines 10-17.

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AV control terminals of <u>Saito</u> merely exchange the FANP-AV request packet and the FANP-AV response packet.<sup>3</sup>

Accordingly, as <u>Saito</u> fails to disclose or suggest the packet correspondence memory and destination node identification unit as recited in Claims 1, 31, and 34, it is respectfully submitted that these claims patentably distinguish over <u>Saito</u>. Likewise, it is respectfully submitted that dependent Claims 2-9 patentably distinguish over <u>Saito</u>.

Consequently, in view of the foregoing discussion and present amendments, it is respectfully submitted that this application is in condition for allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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<sup>&</sup>lt;sup>3</sup> <u>Id.</u> at col. 14, lines 36-49.